

176457  
SA  
ORS

NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

Attorneys at Law

Leon L. Nowalsky  
Benjamin W. Bronston  
Edward P. Gothard

3500 North Causeway Boulevard

Suite 1442

Metairie, Louisiana 70002

Telephone: (504) 832-1984

Facsimile: (504) 831-0892

Writer's Direct Dial Number: (504) 293-8203

RECEIVED

2005 OCT 25

Monica Borne Haab

Ellen Ann G. Sands

Philip R. Adams, Jr.

Of Counsel

Bruce C. Betzer

October 24, 2005

VIA OVERNIGHT DELIVERY

Executive Secretary  
South Carolina Public Service Commission  
101 Executive Center Drive  
Columbia, SC 29210

2005-331-C

Re: Notification by Adelphia Telecommunications, Inc. and Telecom Management, Inc. d/b/a Pioneer Telephone of an Asset Purchase Agreement

Dear Sir or Madam:

Pursuant to Applicants' request for expedited review in this matter, enclosed please find the original and five (5) copies of the Verified Testimony, as required by the Commission, in order to proceed with the merger approval in South Carolina.

*db* In order to acknowledge receipt of this filing, please date stamp the enclosed additional copy of this letter and return it in the envelope provided.

Thank you for your assistance in this matter. If you need additional information, please do not hesitate to call.

Sincerely,

*Edward P. Gothard*

Edward P. Gothard

EPG/pcf  
Enclosure

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2005-331-C

Verified Testimony of Sue Bouchard

IN RE: Application for Approval of an Asset Purchase Agreement between Adelphia Telecommunications, Inc. ("ATI") and Telecom Management, Inc. d/b/a Pioneer Telephone ("Pioneer")

---

- Q. Would you please state your name, title and business address for the record?
- A. Sue Bouchard, President of Telecom Management, Inc., 583 Warren Avenue, Portland, Maine, 33815.
- Q. What authority does the Application seek?
- A. The application requests Commission approval of an Asset Purchase Agreement between Adelphia Telecommunications, Inc. ("ATI") and Telecom Management, Inc. d/b/a Pioneer Telephone ("Pioneer"). Under the Agreement, Pioneer will acquire substantially all of the long distance telecommunications assets of Adelphia, including but not limited to Adelphia's customer accounts.
- Q. Does Adelphia presently hold authority from the Commission?
- A. Yes. Adelphia is a certificated carrier in this state, pursuant to Docket No. 98-82.
- Q. Does Pioneer presently hold authority from the Commission?
- A. Yes. Pioneer is a certificated carrier in this state, pursuant to Docket No. 2004-232-C.
- Q. Will Adelphia continue to provide service as an independent entity after the transaction?
- A. No. Pioneer will provide service pursuant to its own certification and Adelphia will cancel its certification.

- Q. How will the transaction affect Adelphia's current customers in South Carolina?
- A. The transaction will ensure that current Adelphia customers maintain uninterrupted service. All current Adelphia customers will be given the opportunity to switch their service from Adelphia to a different carrier. Those customers of Adelphia who choose not to switch their service to a different carrier will receive service from Pioneer pursuant to Pioneer's South Carolina authority.
- Q. Is Pioneer experienced and financially qualified to consummate this transaction?
- A. Yes. Pioneer is well-qualified to consummate the transactions proposed in the Application.
- R. Does this complete your testimony at this time?
- A. Yes, it does.